

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

01 DEC -7 AM 11:00

BRENDA K. HURSTON

:

CASE NO. C-1-01-313

Plaintiff

:

Judge Weber; Black M.J.

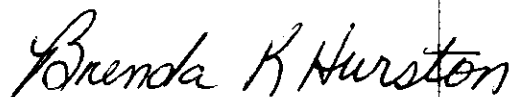
-VS-

BUTLER COUNTY DEPT. OF
JOB AND FAMILY SERVICES

**PLAINTIFF'S MOTION TO FILE MOTION TO REQUEST EXTENSION OF
TIME TO PERMIT CONTINUED DISCOVERY.**

COME NOW, the plaintiff, Brenda K. Hurston request motion to file for
extension of time permitting continued discovery for good cause shown. This motion
is supported by the attached Memorandum.

Respectfully submitted,



BRENDA K. HURSTON, Plaintiff, Pro Se
1812 Grand Ave.
Middletown, OH 45044
(513) 420-9692


MEMORANDUM

In support of plaintiff's response, Brenda K. Hurston offers the following:

1. Defendant's counsel was not available to take the deposition of plaintiff's witnesses until November 23, and 24, 2004 that conflict with the plaintiff's witnesses plans to celebrate Thanksgiving, which was on November 25, 2004. Therefore the first two depositions were taken on December 1, 2004.
2. As of December 6, 2004, the deposition of Geraldine Bryant, Floyd Hurston, and Marilyn Lacey have not been taken.
3. Plaintiff requests additional time to continue and to permit discovery, due to the conflicts in the scheduling of the plaintiff existing witnesses, providing a minimum of sixty days from December 6, 2004.

Respectfully submitted,

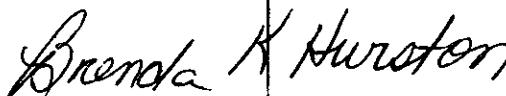
BRENDA K. HURSTON



Brenda K. Hurston, Plaintiff, Pro Se
1812 Grand Avenue
Middletown, OH 45044
(513) 420-9692

CERTIFICATE OF SERVICE

I, Brenda K. Hurston, hereby certify that a true and correct copy of Plaintiff's motion and memorandum requesting extension of time has been sent by fax and regular mail to Jack C. McGowan, Attorney for Defendant, Butler County Department of Job and Family Services, 246 High Street, Hamilton, Ohio 45011, this 6th, day of December, 2004.



Brenda K. Hurston, Plaintiff, Pro Se